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April 25, 2018

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**RE: Amendment of Parts 1 and 22 of the Commission's Rules with regard to the Cellular Service, Including Changes in Licensing of Unserved Areas, WT Docket No. 12-40**

Dear Ms. Dortch:

Pursuant to the *Second Report and Order* and Verizon's commitment in the above-referenced docket, Verizon provides the following report on the tests it conducted for interference into public safety equipment operating in the 806-815/851-860 MHz band from base stations operating with the new power spectral density (PSD) limits for Cellular Service base stations.<sup>1</sup>

Verizon has a long history of working closely with public safety licensees and will address any interference into public safety equipment that may arise as a result Verizon's use of the new PSD limits for the Cellular Service. To that end, Verizon committed to use the test plan developed by AT&T and public safety in Docket No. 13-202 in several markets to determine whether base stations operating at the new PSD limits would interfere with public safety equipment.

Verizon has fulfilled this commitment in six markets and has received no complaints from public safety entities arising from operation of its base stations in these markets with the new Cellular Service PSD limits.

Verizon selected six markets representing a wide range of conditions and invited public safety entities in those markets to test public safety equipment with Cellular Service base stations operating at the new PSD limits. Verizon provided a minimum of 30 days advance written notice to all public safety entities using equipment operating at 806-815/851-860 MHz within a 113 km radius of the sites selected for testing. For each base station site, Verizon shared its coverage plots, antenna information, and any other details requested by public safety. The notifications invited the public safety licensees to perform tests with public safety equipment and report any issues experienced during the tests.

Testing was conducted in Chicago with representatives from Motorola Solutions who had previously informed the Association of Public-Safety Communications Officials-International, Inc. (APCO) that Motorola would be the single point of contact for the Chicago tests. On January 17, 2018, Verizon operated two Chicago base stations at ERP settings of 139 W/MHz and 262 W/MHz. The

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<sup>1</sup> See *Amendment of Parts 1 and 22 of the Commission's Rules with regard to the Cellular Service, including Changes in Licensing of Unserved Areas, et al.*, Second Report and Order, Report and Order, and Second Further Notice of Proposed Rulemaking, 32 FCC Rcd 2518, ¶ 25 (2017) ("*Second Report and Order*"); Letter from Linda Vandeloop, AT&T, and Tamara Preiss, Verizon, to Ms. Marlene H. Dortch, Secretary, FCC, WT Docket No. 12-40 (filed May 10, 2016).

Motorola Solutions representatives tested public safety equipment, specifically a Motorola APX 6000 and Motorola XTS 5000, at close proximity to the base stations, approximately 100 meters away. No interference was detected into the Motorola equipment. After the testing, the Motorola Solutions representatives reported that their measurements indicated no interference issues would arise with a PSD setting of 400 W/MHz ERP, as permitted under the new rules for the Cellular Service.

Verizon followed the same procedures in five other markets: Charlotte, NC (seven base stations); Grand Rapids, MI (three base stations); Greensboro, NC (four base stations); Lansing, MI (two base stations); and Raleigh, NC (four base stations). Again, Verizon provided a minimum of 30 days advance written notice to all public safety entities using equipment operating at 806-815/851-860 MHz within a 113 km radius of the selected base station sites, and invited them to conduct tests at the base stations in the markets. Over three days from February 19 through 21, 2018, the base stations at these sites were operated at the PSD limits permitted under the new rules: 400 W/MHz ERP in non-rural areas. While no public safety representatives brought equipment to the base station sites to test, Verizon received no reports of interference from any of the public safety entities. Verizon believes that the results reported in Chicago indicate that operations in these additional markets pose no threat to public safety equipment. Should any interference problems arise, however, Verizon will of course address them.

With the notifications to the public safety entities, Verizon provided contact names and a web portal (<http://www.publicsafety800mhzinterference.com>) to report interference issues. The Verizon contacts have received no reports of interference issues, and no issues have been reported via the Public Safety 800 MHz interference portal.

Verizon considers these tests complete but is willing to provide additional details to the Commission if requested.

Consistent with the *Second Report and Order*, Verizon plans to roll out PSD operations in additional markets, again providing advance notice to local public safety agencies with an opportunity to assess results after 60 days.<sup>2</sup> The process established in the *Second Report and Order* will allow Verizon to use its licensed Cellular spectrum for LTE services and enable Verizon to meet the constantly-growing consumer demand for mobile data services.

Pursuant to the request of the Wireless Telecommunications Bureau, Verizon is filing this report electronically in the above-referenced docket.

Respectfully submitted,



cc: (by email)  
Donald Stockdale  
Roger Noel  
Nina Shafran

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<sup>2</sup> See *Second Report and Order*, ¶ 25.